



NEW YORK
REGIONAL OFFICE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
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NEW YORK, NY 10004-2616

July 14, 2022

VIA ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York

Re: SEC v. Ripple Labs, Inc. et al., No. 20-cv-10832 (AT) (SN) (S.D.N.Y.)

Dear Judge Torres:

Pursuant to the Court's July 11, 2022 order (D.E. 529), the SEC respectfully submits proposed redactions (concurrently filed under seal as exhibits to this letter) to Exhibits C, H, and L to the SEC's response ("SEC Response," D.E. 499) opposing the motion by six XRP investors to file a brief regarding the opinions of one of the SEC's experts (the "Expert"). The SEC does not seek to make any redactions to Exhibits M, N, O, or Q and believes those documents should be made publicly available pursuant to the Court's July 11 order.

The Court has already granted the SEC's application to redact the name of the Expert from Exhibit B to the SEC Response, as well as from Exhibit 1 to a response letter filed by Defendants (D.E. 503), finding that the proposed redactions "are narrowly tailored to serve interests of witness safety." D.E. 529 at 5. The SEC now seeks to redact the Expert's name from Exhibits H and L, as well as the name of another SEC expert from Exhibit C. These redactions are also narrowly tailored to serve the interests of witness safety, and the SEC's application should therefore be granted. *See id.*; *see also Walker v. City of N.Y.*, No. 15 Civ. 500, 2017 WL 2799159, at *6 (E.D.N.Y. June 27, 2017) (sealing motion for summary judgment because "the safety of the complaining witness and his family constitutes a 'higher value' which should be protected," quoting *Lugosch v. Pyramid Co. of Onondaga*, 435 F3d 110, 119–20 (2d Cir. 2006)).

Respectfully submitted,

/s/ Ladan F. Stewart

Ladan F. Stewart

cc: Counsel for All Defendants (*via* ECF)